



START

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10 HANFORD PROJECT OFFICE

712 SWIFT BOULEVARD, SUITE 5

RICHLAND, WASHINGTON 99352

June 18, 1993

9305527



Mary Lou Blazek
Oregon Department of Energy
625 Marion Street N.E.
Salem, Oregon 97310

Re: Riverland Expedited Response Action Proposal Comments
Response

Dear Ms. Blazek:

Thank you for taking the time to review and comment on the Riverland Expedited Response Action (ERA) proposal.

Your comments indicated a concern related to the lack of groundwater monitoring associated with the site. At this time the U.S. Environmental Protection Agency (EPA) does not believe that contaminants present at this site warrant the need for groundwater monitoring. However, the cleanup is being conducted using the observational approach. Under the observational approach, characterization is conducted as the soil is removed. If during removal, significant amounts of contaminants are encountered the agencies will re-evaluate the need for groundwater monitoring.

You also expressed a concern regarding the wide variability in the split samples. The reason for the disparity is not known. However, the agencies decided to take a conservative approach and use the higher of the two numbers. It was more economical to use this conservative approach rather perform another round of confirmation sampling.

Again thank you for taking the time to comment on the proposal. If you have any questions, please contact me at (509) 376-8631.

Sincerely,

Dennis A. Faulk
Environmental Scientist

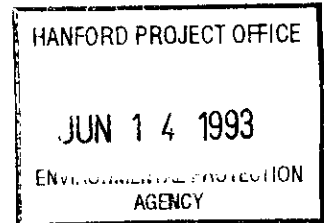
cc: Becky Austin, WHC
Jack Donnelly, Ecology
Mary Getchell, Ecology
Paul Pak, DOE
Administrative Record (Riverland ERA)



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June 7, 1993

U.S. Environmental Protection Agency
Region 10 Hanford Project Office
712 Swift Boulevard, Suite 5
Richland, Washington 99352



Attn: Dennis A. Faulk
Unit Manager

Re: Riverland Expedited Response Action Proposal
DOE/RL-93-01, Revision 0, UC-630, Published April 1993

We reviewed the proposed action and respectfully submit these comments:

1. No groundwater monitoring wells exist or are requested for this site. As a consequence, migration of contaminants to and with the groundwater cannot be predicted.
2. Section 2.1.1 indicates that "Most decontamination activities concentrated on wheels, axles, brake assemblies,...". Later, the report states that workers used acetone soaked pads to wipe down this equipment. If degreasers, other than acetone, were used in this operation, soil and groundwater should be analyzed for these materials.
3. Section 2.1.3 indicates that one homesite contained a pile of herbicide/pesticide containers. It should indicate the contents, size or quantity of these containers.
4. Section 4.0 states "While controlling cost is important, protecting the environment and public health in a timely manner is more important." We agree. Delays in cleanup will increase the extent of contamination and the cost of cleanup. Delays should be avoided.
5. The cleanup target of 200 ppm of diesel compounds is extremely liberal and does not specify what specific test or compounds to include. It would be more appropriate to continue the cleanup to the same levels as required by the Washington State Department of

Barbara Roberts
Governor



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Ecology in other areas of the State. The applicable regulatory limit is 200 mg/Kg (soils) rather than 200 ppm (water).

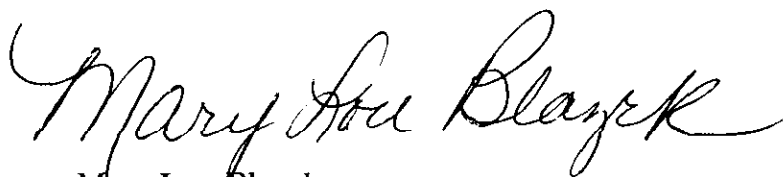
6. The table of sample results shows samples B01930 and B01931 as being duplicates. The levels of Diesel reported on these two analysis are greatly different. Also, there is wide variation in the levels of potassium-40 reported. These anomalies need to be explained. The second page of the sample results shows samples B01939 and B01940 as splits. The levels of pesticide reported in these samples is greatly different.

These differences need to be explained. New or additional analysis may need to be performed to find the source of error.

7. Groundwater analyses need to be performed.
8. The sampling of soil appears to be from surface samples. The report does not indicate any sampling of soil at depth was performed. The report indicates in section 2.1.1 that facility decontamination occurred about 1963. It does not indicate what that cleanup entailed, or how much if any surface fill was brought in. If the site is buried under two feet of soil (as section 2.1.1 seems to imply), the low levels of nuclides and contaminants found in surface samples are not surprising. If this is the case, additional sampling at depth should be performed.

If you have any questions, please contact Dirk Dunning at (503) 378-3187.

Sincerely,



Mary Lou Blazek
Oregon Department of Energy
625 Marion Street N.E.
Salem, Oregon, 97310

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Addressee

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M. L. Blazek, Oregon DOE

Incoming: 9305527

Subject: Riverland Expedited Response Action Proposal Comments Response

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